

HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

HP TUNERS, LLC, a Nevada limited liability company,)	CASE NO. 3:17-cv-05760-BHS
)	
Plaintiff,)	SUPPLEMENTAL DECLARATION OF
)	ANDREW P. BLEIMAN, ESQ. IN
vs.)	SUPPORT OF PLAINTIFF’S
)	SUPPLEMENTAL RESPONSE IN
KEVIN SYKES-BONNETT and SYKED ECU TUNING INCORPORATED, a Washington corporation, and JOHN MARTINSON,)	SUPPORT OF MOTION FOR
)	SANCTIONS
)	
Defendants.)	

I, Andrew P. Bleiman, Esq., of full age and competency, do hereby certify and say as follows:

1. I am an attorney of the State of Illinois and the Managing Attorney of the law firm Marks & Klein, LLP’s Illinois office. In that capacity, I have been entrusted with the above-captioned file. I am fully familiar with the facts and circumstances alleged herein.
2. This Declaration is submitted in support of Plaintiff’s Supplemental Response in Support of Plaintiff’s Motion for Sanctions.
3. Attached hereto as Exhibit A is a true and correct copy of the transcript of the

1 Deposition of Kevin Sykes-Bonnett, dated September 25, 2018.

2 4. Attached hereto as Exhibit B is a true and correct copy of the transcript of the
3 Deposition of John Martinson, dated September 26, 2018

4 I certify that all of the foregoing is true and accurate to the best of my knowledge, and if
5 any of the foregoing is willfully false, I am subject to punishment.

6 Dated: January 30, 2019

Respectfully submitted,

7 s/ Andrew P. Bleiman

8 Andrew P. Bleiman

9 (admitted *pro hac vice*)

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12 *Attorneys for HP Tuners, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2019, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system which will electronically send notice to all Counsel of Record.

HEURLIN, POTTER, JAHN, LEATHAM,
HOLTMANN & STOKER, P.S.

s/ Stephen G. Leatham

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Attorney for HP Tuners, LLC

EXHIBIT A

FILED UNDER SEAL

EXHIBIT B

FILED UNDER SEAL